

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

KIMBERLY TIGNER,

Plaintiff,

vs.

**CHARLOTTE-MECKLENBURG
SCHOOLS,**

Defendant.

Civil Action No. 3:18-CV-680

**Consent Motion for Extension of Time
to Respond to Defendant's Motion to
Dismiss**

Plaintiff Kimberly Tigner ("Plaintiff"), by and through the undersigned Counsel and pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, respectfully requests a two week extension of time in which to respond to the Defendant's Motion to Dismiss. As grounds for this Motion, Plaintiff respectfully shows as follows:

1. Plaintiff filed the Corrected Amended Complaint on June 10, 2019 with this Court.
2. Defendant filed a Motion to Dismiss and Brief in Support of Defendant's Motion to Dismiss on July 2, 2019, meaning Plaintiff's response is due on or before July 16, 2019.
3. Given the Independence Day holiday, Counsel requests additional time to fully respond to Defendant's Motion.
4. Counsel for Plaintiff consulted with Defense Counsel, who consents to this motion.
5. The original time for responding has not yet expired, and the undersigned Counsel seeks this extension for good cause, and not for the purpose of unnecessary delay.

Therefore, the undersigned Counsel respectfully requests a fourteen (14) day extension of time to respond to the Defendant's Motion to Dismiss, up to and including Tuesday, July 30, 2019.

This the 8th day of July, 2019

Vennum PLLC

By: /s/ Elizabeth Vennum
Elizabeth Vennum
N.C. State Bar No. 49747
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Counsel for Plaintiff

Certificate of Service

This is to certify that on this date the undersigned filed the foregoing **Consent Motion for Extension of Time to Respond to Defendant's Motion to Dismiss** using the Court's CM/ECF system which will send notification of such filing to the following CM/ECF participants:

Courtney C. Rogers
Senior Associate General Counsel
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Counsel for Defendant

/s/ Terry L. Wallace
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This the 8th day of July 2019.

Venum PLLC

By: /s/ Elizabeth Venum
Elizabeth Venum
Venum PLLC